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October 16, 2019

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Andrea Tantaros v. Fox News Network, LLC, 19 Civ. 07131

Dear Judge Carter:

I am the lead trial counsel for the Estate of Roger Ailes in this matter. We are aware of Your Honor's Individual Rule 3.A. ("Principal Trial Counsel") which obliges principal trial counsel for each party to attend all conferences with the Court. Unfortunately, I now have a conflict on my calendar for October 22, 2019, when there is a conference scheduled before you regarding the pending motion to remand. I am scheduled to take the deposition of a witness who resides in a foreign country on that date. The witness is coming to New York from Europe for the deposition and it would be very difficult to alter the date of the deposition. I therefore ask leave of Court for Kimberly Carson, who has already entered an appearance in this matter (Dkt. 17), and who also represents the Estate, to attend the conference in this matter in my place.

Respectfully,

/s/ Peter E. Calamari

Peter E. Calamari, Esq.

PEC

**quinn emanuel urquhart & sullivan, llp**

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